UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

May 10, 1995

REF: 4WD-SSRB

Mr. Hugo Fleischman
U.S. EPA Headquarters
401 M Street, SW / 5203G
Washington, D.C. 20460

SUBJ: Five-Year Review
Gold Coast Oil NPL Site
Dade County, Florida

Dear Mr. Fleischman:

A Five-Year review of the Gulf Coast Oil NPL Site in Dade County, Florida, was conducted in November 1994 and approved in January 1995. It recently came to my attention that the Five-Year review was never distributed after it was approved. A copy of the Five-Year Review Report prepared by EPA is enclosed for your files. If you have any questions with regard to the enclosed information, please call me at (404) 347-2643, Ext. 6246.

Sincerely,

Pamela J. Langston Scully, P.E.
Remedial Project Manager
South Superfund Remedial Branch

Enclosure

cc: Marvin Collins, FDEP

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

4WD-SSRB

MEMORANDUM

SUBJECT: **Gold Coast Oil NPL Site**
Five-Year Review

FROM: **Douglas F. Mundrick, Chief**
South Superfund Remedial Branch

TO: **Joseph R. Franzmathes, Director**
Waste Management Division

THRU: **Richard D. Green, Associate Director**
Office of Superfund and Emergency Response

Attached please find a copy of the Five-Year Review Final Report for the Gold Coast Oil NPL Site in Dade County, Florida. Section 121(c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, requires that if a remedial action is taken that results in any hazardous substances, pollutants, or contaminants remaining at the site, the Environmental Protection Agency (EPA) shall review such remedial action no less often than each five years after initiation of such remedial action to assure that human health and the environment are being protected by the remedial action being implemented.

Both soil and ground water contamination are addressed at the Gold Coast Oil NPL Site. The selected remedy for the soil component included excavation and offsite disposal of hardened waste sludges and excavation,stabilization, and onsite disposal of surface soils contaminated with VOCs and metals. The soils remediation was complete in February 1990.

The remedy also provided for the implementation of a ground water recovery, treatment, and disposal system for the remediation of VOCs in the ground water. The ground water has been remediated to levels that are approaching performance standards established in the 1987 Record of Decision for the Site. Actions are underway at the Site to reduce the levels of ground water contamination below performance standards.

The attached Five-Year Review Final Report, dated November 1994, has been peer reviewed by Region IV and Headquarters staff.

The attached report documents the current conditions at the site, states that the remedial action is ongoing and continues to be protective of human health and the environment, and makes recommendations regarding future site reviews.

Based on the ongoing actions at the Site and the interviews conducted during the review, the remedial action meets the requirements of the Record of Decision (ROD). EPA will ensure that the site remains protective by approving conducting Five-Year Reviews in the future. The next review will be conducted before February 6, 1999.

Attachment

Approved by: _____ **Date:** 1/25/95

Joseph R. Franzmathes, Director
Waste Management Division
EPA Region IV

FIVE-YEAR REVIEW

GOLD COAST OIL SITE

MIAMI, FLORIDA

PREPARED BY

U. S. ENVIRONMENTAL PROTECTION AGENCY

REGION IV

ATLANTA, GEORGIA

TABLE OF CONTENTS

LIST OF ACRONYMS

ARAR	Applicable or Relevant and Appropriate Requirement
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act (Superfund)
COE	U.S. Army Corps of Engineers
EA	Environmental Assessment
EPA	United States Environmental Protection Agency
FAC	Florida Administrative Code
FDEP	Florida Department of Environmental Protection
FWS	United States Fish and Wildlife Service
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
OSWER	Office of Solid Waste and Emergency Response
O&F	Operational and Functional
O&M	Operation and Maintenance
ROD	Record of Decision
SARA	Superfund Amendments and Reauthorization Act

1. BACKGROUND

1.1 Introduction

This report documents a five-year review conducted in November 1994 for the Gold Coast Oil NPL Site, located in Dade County, Florida. The U.S. Environmental Protection Agency (EPA), Region IV, conducted this review pursuant to CERCIA § 121(c), NCP § 300.430(f)(4)(ii), and Office of Solid Waste and Emergency Response (OSWER) Directive 9355.7-02 (May 23, 1991) and 9355.7-02A (1994). It is a statutory review. Statutory five-year reviews are required no less often than each five years after the initiation of the remedial action. The purpose of a five-year review is to evaluate whether the response action remains protective of public health and the environment and is functioning as designed. This document will become a part of the Site File. This is a Type Ia review. A Type 1a review is applicable to a Site at which response is ongoing.

1.2 Site Location and Description

The Gold Coast Oil Site is a 2-acre parcel of flat, sandy land located at 2835 S.W. 71st Avenue, Miami, Florida. The site has no distinguishable surface drainage and is enclosed by a fence with a locking gate. It is bordered on the north and west by railroad tracks, on the south by a group of small businesses (an automotive maintenance garage, a painting shop, and a cabinet shop), and on the east by S.W. 71st Avenue. The Coral Gables Canal is approximately 850 feet south of the Site on the other side of the small businesses. The canal drains to the Biscayne Bay and on to the Atlantic Ocean. The Site is within the 100-year flood plain, but flooding from canal overflow is not likely as the canal flow is regulated. Figure 1 is a site map.

1.3 Site History

The Site property is owned by CSX Transportation, who leased the property to Gold Coast Oil in the early 1970's. Gold Coast Oil, along with Solvent Extraction, Inc., were in the business of distilling mineral spirits and lacquer thinner and reclaiming solvent. Blowdown from the operations sprayed directly onto the ground. Stillbottom waste from the distilling operation was pumped into a tank truck for storage. There were also 2500 corroded and leaking drums containing sludge from the distilling operation, contaminated soils, and paint sludges located onsite, along with large storage tanks of hazardous waste. All wastes generated by the solvent recovery operations were disposed or stored onsite; no waste was shipped offsite during the 11 years of operation.

A number of environmental agencies tried unsuccessfully to regulate activities at the Gold Coast Oil Site. In 1981, Dade County Department of Environmental Resources Management (DERM) reported the Site to EPA. In June 1982, CSX Transportation evicted Gold Coast Oil from the property and agreed to voluntarily clean up the Site. In March 1983, the Florida Department of Environmental Protection (FDEP) requested that EPA take the lead at the Site, and in September 1983 the Site was added to the National Priority List (NPL).

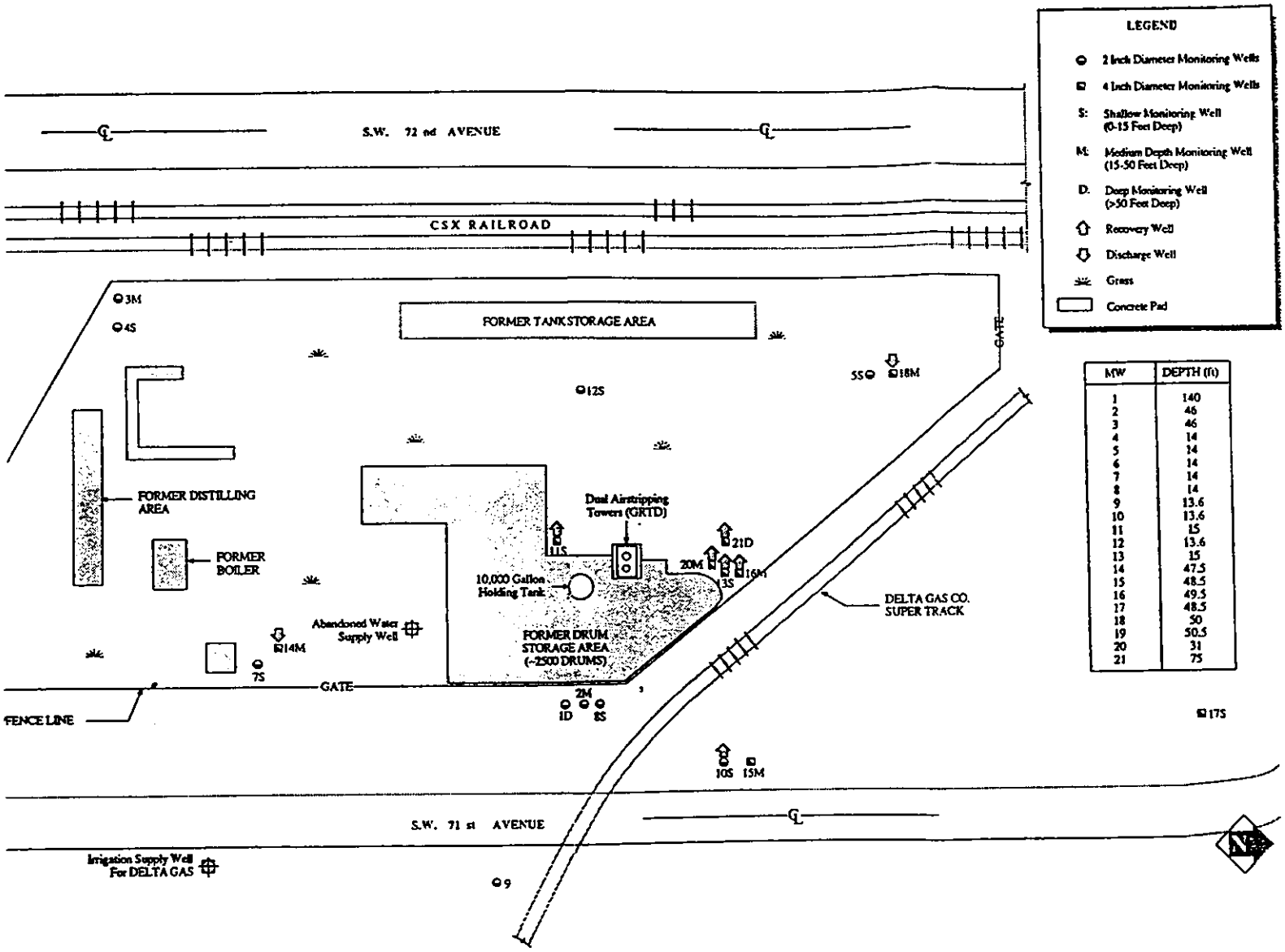

Figure 1. Site Map

1.4 Remedial Objectives

A Record of Decision was issued by EPA on September 11, 1987, which selected a final remedy for the Site. The remedy provided for the excavation and offsite disposal of hardened waste sludges and the excavation, stabilization, and onsite disposal of surface soils contaminated with volatile organic compounds (VOCs) and metals. The remedy also provided for the implementation of a ground water recovery, treatment, and disposal system for the remediation of VOCs in the ground water. This component of the remedy included collection of ground water through recovery wells, onsite treatment through air stripping, and onsite disposal of treated effluent to the Biscayne aquifer through an injection well.

1.5 ARARs Review

Site-specific cleanup levels were established by EPA and FDEP based on cleanup levels established in the Biscayne Aquifer Study, toxicological information, and Federal and State applicable or relevant and appropriate requirements (ARARs). The cleanup levels identified in the ROD are as follows:

	Contaminant	Cleanup Level, ug/l
Soil	lead	100,000
Ground Water	1,1-dichloroethane	5
	t-1,2-dichloroethane	70
	methylene chloride	5
	tetrachloroethylene	0.7
	tolune	340
	trichloroethylene	3

In March 1994, EPA issued an Explanation of Significant Differences to document changing the cleanup level for tetrachloroethene to the State MCL of 3 ug/L.

As part of the five-year review, EPA reviewed the ARARs for this Site. The soil cleanup level for lead appears to be well below levels currently recommended by Region IV EPA and is considered protective of human health and the environment. The ground water cleanup levels appear to meet all ARARs and, also, are considered protective of human health and the environment. EPA did not identify any changes in the ARARs which would challenge the protectiveness of the remedy selected.

• SITE CONDITIONS

2.1 Status of Long-Term Remedial Action at the Site

Remediation of the soil was completed in February 1990. The ground water remediation system was implemented in July 1990 and has significantly reduced VOC contaminant levels within the ground water. The size of the ground water plume has been reduced to the point that it encircles only one, and occasionally two, wells. The concentration of the most persistent parameters of concern, tetrachloroethylene (PCE) and trichloroethylene (TCE), have been reduced from high values of 44,000 ug/L of PCE and 1700 ug/L of TCE to levels below detection limits (BDL). However, occasional spikes produce average values of PCE at 40 ug/L and TCE at 13 ug/L. The PRP's have tried adding hydrogen peroxide to the wells, pulse pumping the system, and soil venting in order to improve removal of the remaining contaminants, with no demonstratable improvement in ground water quality.

EPA met with representatives of the PRPs on October 11, 1994, to discuss the options remaining at the Site. Because the levels of VOCs have decreased substantially over the four years of treatment system operation and because levels remain below detection limits when pumping is continuous, EPA agreed with the PRPs that continuous pumping and treatment of ground water would serve no further useful purpose at the Site. The following options were identified during the meeting as possible alternatives to continued pumping and treatment of ground water.

- cyclical pumping and treating of ground water,
- natural attenuation of TCE and PCE with ground water monitoring until ARARs are achieved; and
- removal of additional soils in areas where concentrations persist and then natural attenuation and ground water monitoring until ARARs are reached.

In a letter dated October 17, 1994, the PRP's proposed that a limited soil excavation program be conducted. EPA agreed that excavation of soils might help reduce the length of time required to monitor ground water until ARARs are achieved; EPA subsequently approved the soil excavation plans on November 9, 1994.

On November 16 through 18, 1994, approximately 230 cubic yards (CY) of soil was excavated and contained onsite. Initial tests on the soil indicated that contaminant levels are below detection levels. The sides of the excavation will be tested to ascertain if additional excavation is warranted. After the soil is aerated, it will be placed back in the ground and the monitoring wells will be reinstalled.

2.2 Summary of Interviews

Mr. Marvin Collins, of the Florida Department of Environmental Protection (FDEP) in Tallahassee, Florida was contacted on November 8, 1994, concerning the latest sampling results and the PRPs plans to excavate soils and monitor ground water at the Site. Mr. Collins had some questions regarding the disposal methods of the potentially contaminated soil and the objective of the

excavation. After further discussion with Mr. Collins, he expressed general concurrence with thisapproach.

Mr. Collins contacted Mr. Alex Montalvo, of the Metro-Dade Department of Environmental Resources Management (DERM), concerning the excavation activities at the Site. Mr. Montalvo will split samples with the PRPs prior to completion of the work to verify that soil materials are handled appropriately at the Site.

2.3 Areas of Non-Compliance

A long-term remedial action is still underway at the Site, and, therefore, the Site is not in compliance with ARARs established in the ROD.